

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No.: 3: 10-CR-160
)	(VARLAN/GUYTON)
SANDRA KINCAID a/k/a Sandee,)	
RANDY KINCAID,)	
WENDI HENRY,)	
and DUSTIN MORGAN,)	
)	
Defendants.)	

NOTICE OF EXPERT WITNESS TESTIMONY
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 16
FILED ON BEHALF OF DEFENDANTS
SANDRA KINCAID AND WENDY HENRY

COME the Defendants, SANDRA KINCAID and WENDI HENRY, by and through respective counsel, and, pursuant to Federal Rule of Criminal Procedure 16(b)(C), hereby files this notice of expert witness testimony and summary thereof.

The Defendants give notice that they may present the expert testimony of **Clifford M. Davidson, M.D.**, in this cause. Dr. Davidson is a staff physician at Westbrook Medical Center in Knoxville, Tennessee. Dr. Davidson received his medical training at the University of Alabama School of Medicine, where he received his Medical Doctor degree in 1986; he also studied medicine at the Melbourne University Medical School in Melbourne, Australia in 1985-86. Dr. Davidson was an intern and medical resident at the Medical University of South Carolina, and completed his residency in the field of internal medicine at the University of Tennessee Medical Center at Knoxville in

1992, as well as a residency in nuclear medicine at the University of Tennessee Medical Center at Knoxville in 1994. He has been licensed to practice medicine in Tennessee since 1993.

Following the completion of his residency, Dr. Davidson has worked as a staff physician in Knoxville, Tennessee; since 2007 he has worked at Westbrook Medical Center in Knoxville, Tennessee. As part of his practice, Dr. Davidson is involved in pain medication management, and is familiar with accepted medical practices and standards of care regarding pain medication management.

As rebuttal to any medical expert testimony offered, and as part of their case regarding the allegations in the Indictment, the Defendants may offer the testimony of Dr. Davidson regarding the legitimacy of Breakthrough Pain Therapy Center as a medical pain management practice, as well as the appropriateness of the standard of care provided at Breakthrough Pain Therapy Center. If offered, Dr. Davidson's testimony will be based on his review of Breakthrough Pain Therapy Center patient files that were seized from Breakthrough Pain Therapy Center pursuant to a federal search warrant, which were provided to the Defendants as part of the discovery in this cause. Dr. Davidson's testimony may also be based on his review of testimony by government expert witnesses in this and other cases, as well as other information developed through the proof in this cause, and his professional training and experience.

The Defendants reserve the right to supplement the foregoing expert designation should counsel for the Defendants obtain additional relevant information and/or materials provided by the United States or other sources.

Respectfully submitted this 28th day of September, 2013.

THE ISAACS LAW FIRM

s/Gregory P. Isaacs

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was filed electronically, with notice of this filing to be sent by operation of the Court's electronic case filing system; any other interested parties will be served by regular United States Mail with prepaid first-class postage thereon sufficient to cause delivery. Parties may access this filing through the Court's electronic case filing system.

This the 27th day of September, 2013.

By: s/Gregory P. Isaacs